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July 28, 2016

VIA ECF

Honorable LaShann DeArcy Hall
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Rasulev v. Good Care Agency, Inc., Case No. 1:16-cv-01993 (LDH) (CLP)

Dear Judge Hall:

We represent Defendant Good Care Agency, Inc. in the above referenced matter.

We are writing to request an adjournment of the Pre-Motion Conference currently scheduled for August 25, 2016, at 12:00 P.M. Unfortunately, I have had longstanding vacation plans and will be out of town on that date.

This is the first such request for an adjournment. Plaintiff's counsel has consented to our request. After conferring with Plaintiff's counsel, we would respectfully propose the following dates for the Pre-Motion Conference: August 18th, 19th, or 30th, 2016, as convenient to the Court. Counsel also conferred regarding availability in September, as we are aware your Honor has several trials taking place in August. The only September dates available to all parties are in the second half of the month. If the foregoing August dates are not available, the parties will confer further to propose September dates.

We thank the Court for its consideration.

Respectfully yours,

/s/ Eve I. Klein

Eve I. Klein